

From: [Clara Ross <ross_c1933@yahoo.com>](mailto:Clara.Ross<ross_c1933@yahoo.com>)
 To: [Veronica Mina <mina@kaganstern.com>](mailto:Veronica.Mina<mina@kaganstern.com>)
 Subject: Re: Henry v Hall
 Date: 01.06.2024 23:59:56 (+02:00)

Ms Mina in response to your email. After reading the Court documents Terrance and I just received in the mail. We are not clear on some of the legal terms in the document. Also other complaints along with Mr Kerr, against our denial, being added to the complaint we feel that it is best for us to obtain an attorney to represent us in this matter for all fairness

Thank you
 Ms Hall

[Sent from Yahoo Mail for iPhone](#)

On Friday, May 31, 2024, 9:36 AM, Veronica Mina <mina@kaganstern.com> wrote:

Lisa and Terrance,

I am following up on below. What is the status of your discovery answers, responses, and documents? They are overdue. If I do not receive them by the end of today, I will file appropriate motions with the Court on Monday. This is a good faith attempt to resolve a discovery dispute.

Thanks,



Veronica J. Mina / Attorney
mina@kaganstern.com

Kagan Stern Marinello & Beard, LLC
 238 West Street
 Annapolis, Maryland 21401
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 (410) 216-7900, ext. 1017
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From: Veronica Mina
Sent: Wednesday, May 29, 2024 11:58 AM
To: Clara Ross <ross_c1933@yahoo.com>
Cc: Jonathan Kagan <kagan@kaganstern.com>; Michael Marinello <marinello@kaganstern.com>
Subject: RE: Henry v Hall

Lisa,

I did not receive anything last night so please resend today. Please also note that we must have full and complete answers, responses, and documents pursuant to the issued discovery. Regarding the depositions, as I mentioned in my email below, the depositions will take place at our office without change. Please make prior arrangements to ensure that you and Terrance timely arrive at our office on June 18 for each of your scheduled depositions.

Thank you,



Veronica J. Mina / Attorney
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From: Clara Ross <ross_c1933@yahoo.com>
Sent: Wednesday, May 29, 2024 11:16 AM
To: Veronica Mina <mina@kaganstern.com>
Subject: Re: Henry v Hall

Good morning I sent the discovery answers last night via my phone. I will check once I reach home this evening. Also I requested the litigation beheld by Zoom or a location in between your office and Mr Hall and I location. With the bridge down and the distance to your office is inconvenient.

We greatly appreciate you taking this in consideration
 Thank you
 Mrs Hall

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 29, 2024, 11:07 AM, Veronica Mina <mina@kaganstern.com> wrote:

Lisa and Terrance,

Your discovery answers, responses, and documents were due to us yesterday. I have not received anything from either of you. What is the status of your discovery? Let me know asap. This is a good faith attempt to resolve a discovery despite.

Thanks,



Veronica J. Mina / Attorney

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From: Veronica Mina
Sent: Tuesday, May 28, 2024 10:00 AM
To: 'Clara Ross' <ross_c1933@yahoo.com>
Cc: Jonathan Kagan <kagan@kagantern.com>; Michael Marinello <marinello@kagantern.com>
Subject: RE: Henry v Hall

Lisa and Terrance,

Pursuant to the Notice of Deposition you each received, the depositions will take place at our office without change. Please also note that your discovery answers, responses, and documents are due to us today pursuant to the extension we gave you and the Court's Order, which is attached here for reference.

Thank you,



Veronica J. Mina / Attorney

mina@kagantern.com

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From: Clara Ross <ross_c1933@yahoo.com>
Sent: Tuesday, May 28, 2024 9:25 AM
To: Veronica Mina <mina@kaganstern.com>
Subject: Henry v Hall

Good morning Ms Mina. In regards to litigation which is coming up in your office. Due to the distance of your office I am asking if it could be held by Zoom or a location half way between your office and our location.

I appreciate your response

Thank you

[Sent from Yahoo Mail for iPhone](#)